

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et
al.,

Defendants.

CIVIL NO.: 12-cv-02039

MOTION REQUESTING BRIEF EXTENSION OF TIME

MAY IT PLEASE THE COURT:

COME NOW, Codefendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau ("PRPB"), through the undersigned attorneys, and very respectfully state and pray:

1. During the last status conference hearing, held on June 29, 2023, the parties informed to the Court that they had been working for some time on the preparation of a Searches & Seizures Implementation Plan and on a Sexual Aggression and Domestic Violence Investigations Implementation Plan. The parties represented to the Court that they would be in a position to file both plans with the Court by today, August 31, 2023.

2. In addition, the parties informed the Court that they were also working on a third plan, a supplementation to the

Motion Requesting Brief Extension of Time
Civil No. 12-02039
Page 2 of 4

Staffing Plan. The parties' plan was to file that implementation plan also by today.

3. The parties have been working hard for the last few months towards completing the plans. The parties have agreed on almost all of the substantive parts of the three implementation plans, pending only a revision by the Commonwealth of comments and feedback received today and earlier this week from the United States and the Monitor.

4. In fact, a kick-off meeting of the three plans was held this morning, presided by Secretary Alexis Torres and Commissioner Antonio López. This means that the intention of the Commonwealth is to begin implementing the initiatives of the plans starting today. Both the Secretary and the Commissioner firmly stressed that all members of the Department of Public Safety and of PRPB had the responsibility to carry out the obligations of the plans to the fullest.

5. Therefore, the Commonwealth of Puerto Rico respectfully requests a brief extension of five (5) days, until Tuesday, September 5, 2023, to file the three (3) plans with the Court. This brief period will allow the Commonwealth to incorporate the latest feedback it received, and to ensure the United States, the Monitor, and the Special Master all had the opportunity to review proposed final versions before filing.

Motion Requesting Brief Extension of Time
Civil No. 12-02039
Page 3 of 4

6. The Commonwealth of Puerto Rico had the opportunity to communicate today with plaintiff, the United States, through Jorge Castillo, Esq., who had no objection to the remedy requested herein.

WHEREFORE, Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, respectfully request this Honorable Court to grant the parties a brief extension of five (5) days, until Tuesday, September 5, 2023, to submit the stated three (3) implementation plans to the Court.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

In San Juan, Puerto Rico, this 31st day of August, 2023.

For Defendants COMMONWEALTH OF PUERTO RICO and PUERTO RICO POLICE BUREAU:

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Motion Requesting Brief Extension of Time
Civil No. 12-02039
Page 4 of 4

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